

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

-----X
IRENE KEIRN, AS POWER OF ATTORNEY
FOR DARR KEIRN

Plaintiff,

-against-

JANSSEN PHARMACEUTICALS, INC.;
JANSSEN RESEARCH & DEVELOPMENT LLC;
JANSSEN ORTHO LLC;
JOHNSON & JOHNSON;
BAYER CORPORATION;
BAYER HEALTHCARE LLC;
BAYER HEALTHCARE PHARMACEUTICALS INC.;
BAYER PHARMA AG;
BAYER HEALTHCARE AG;
BAYER AG

Defendants.
-----X

Civil Action No. 19-cv-721

**CONSENT TO
NOTICE OF REMOVAL**

Defendants Janssen Pharmaceuticals, Inc., Janssen Research & Development LLC, and Johnson & Johnson, by and through the undersigned counsel, and with full reservation of all rights, privileges, and defenses, including lack of personal jurisdiction, hereby give consent to the removal of this action, *Irene Keirn, as POA for Darr Keirn v. Janssen Pharmaceuticals, Inc., et al.*, Index No. E167033/2019, Supreme Court of the State of New York, Niagara County, to the United States District Court for the Western District of New York.

Dated: May 31, 2019



Daniel B. Carroll
DRINKER BIDDLE & REATH LLP
1177 Avenue of the Americas, 41st Floor
New York, NY 10036-2717
daniel.carroll@dbr.com
Tel: (212) 248-3140
Fax: (212) 248-3141

*Attorney for Defendants Janssen Pharmaceuticals, Inc.,
Janssen Research & Development, LLC, and
Johnson & Johnson*